

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

Priscilla Sterling, Raine Becker, Shawn  
Miller, and John Bennett, individually and on  
behalf of all others similarly situated

Case No.: 3:22-cv-531-KHJ-MTP

Plaintiffs,

v.

The City of Jackson, Mississippi et al.,

Defendants.

---

**DEFENDANT, TRILOGY ENGINEERING SERVICES, LLC’S UNOPPOSED MOTION  
FOR EXTENSION OF TIME**

---

Defendant Trilogy Engineering Services, LLC (“Trilogy”), by and through undersigned counsel, moves to extend the deadline for filing a motion, answer, or other response to Plaintiffs’ Class Action Complaint for Injunctive Relief and Money Damages with Jury Trial Demand (the “Complaint”) from December 12, 2022, to December 26, 2022.

1. Counsel for Trilogy conferred with Counsel for the Plaintiffs, who does not oppose this motion.
2. The motion is made to provide Trilogy adequate time to respond to the Complaint and to allow all defendants to present their respective defenses on a common schedule, if possible.
3. Counsel for the Plaintiffs has requested up to February 6, 2023, to oppose or otherwise respond to Trilogy’s motion, answer, or other response, and Trilogy does not oppose said relief.<sup>1</sup>

---

<sup>1</sup> On December 5, 2022, Plaintiffs filed an Unopposed Motion for Extension of Time, requesting an extension through January 23, 2023, to oppose or otherwise respond to Defendants’ responses to the Complaint. *See* Dkt. 24. In light of this Motion, Trilogy has agreed to further extend Plaintiffs’ deadline to February 6, 2023.

Given the length and nature of this motion, Trilogy requests that the Court waive the customary requirement of a separate memorandum brief.

Dated: December 12, 2022.

Respectfully submitted,

By: /s/ Davide Macelloni  
Davide Macelloni (FSB No. 1010884)  
Richard G. Daniels (FSB No. 236896)  
DANIELS, RODRIGUEZ, BERKELEY  
DANIELS & CRUZ, P.A.  
*Attorneys for Trilogy Engineering Services,*  
*LLC*  
4000 Ponce De Leon Blvd., Ste. 800  
Coral Gables, FL 33146  
(305) 448-7988  
[dmacelloni@drbdc-law.com](mailto:dmacelloni@drbdc-law.com)

/s/ D. Jason Childress  
D. Jason Childress (MSB No. 103678)  
WISE CARTER CHILD & CARAWAY, P.A.  
*Attorneys for Trilogy Engineering Services,*  
*LLC*  
401 E. Capitol Street, Suite 600 (39201)  
Post Office Box 651  
Jackson, MS 39205-0651  
P: 601-968-5500  
F: 601-968-5593  
[djc@wisecarter.com](mailto:djc@wisecarter.com)

**CERTIFICATE OF SERVICE**

The undersigned certifies that on December 12, 2022, the foregoing document was filed via the U.S. District Court's CM/ECF electronic system and a copy thereof was served upon all counsel of record.

Respectfully submitted,

By: /s/ Davide Macelloni  
Davide Macelloni, Esq. (FSB No. 1010884)